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INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA,  
and NATIONAL UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**CENTURY INDEMNITY COMPANY,**

Plaintiff,

v

**THE MARINE GROUP, LLC, et al.,**

Defendants.

CASE NO. 3:08-CV-01375-AC

**DECLARATION OF KENNETH H.  
SUMNER IN SUPPORT OF GRANITE  
STATE'S AND INSURANCE  
COMPANY OF THE STATE OF  
PENNSYLVANIA'S MOTION TO  
EXCLUDE EXPERTS DENNIS  
CONNOLLY AND ROBERT HUGHES**

Pursuant to Fed. R. Evid. 702

Oral Argument Requested

3:08-cv-01375-AC

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DECLARATION OF KENNETH H. SUMNER  
IN SUPPORT OF GRANITE STATE'S AND ICSOP'S MOTION TO EXCLUDE  
DENNIS CONNOLLY AND ROBERT HUGHES

I, Kenneth H. Sumner, declare as follows:

1. I am an attorney at law, licensed to practice in the State of California and admitted to practice pro hac vice in this case. I am a partner in the firm of Sinnott, Puebla, Campagne & Curet, APLC, counsel for Granite State Insurance Company (“Granite State”) and Insurance Company of the State of Pennsylvania (“ICSOP”) in this case. I am over 18 years of age and competent to testify as to the matters stated herein. I make this declaration in support of Granite State’s and ICSOP’s Motion to Exclude Experts Dennis Connolly and Robert Hughes. As one of the attorneys personally responsible for the above-captioned matter, I am familiar with the files and pleadings produced by the parties. I have personal knowledge of the following facts, and if called to do so, could competently testify thereto.


2. Attached hereto as Exhibit 1 is a true, accurate, and authentic copy of Agricultural Insurance Company and Agricultural Excess and Surplus Insurance Company’s Disclosure of Experts which includes the Expert Report of Dennis R. Connolly.

3. Attached hereto as Exhibit 2 is a true, accurate, and authentic copy of the Expert Report of Robert N. Hughes.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24<sup>th</sup> day of April, 2015 in San Francisco, California.

SINNOTT, PUEBLA, CAMPAGNE & CURET, APLC



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